

Exhibit A



REGISTERED AGENT
SOLUTIONS INC
A LEXITAS COMPANY

Registered Agent Solutions, Inc.
Corporate Mailing Address
5301 Southwest Parkway, Suite 400
Austin, TX 78735
Phone: (888) 705-7274

SERVICE OF PROCESS RECEIPT

2024-04-15

Sarah Clayton

Loyal Source Government Services LLC

12612 Challenger Parkway

Suite 365

Orlando, FL 32826 USA

NOTICE OF CONFIDENTIALITY

This notice and the information it contains are intended to be a confidential communication only to the individual and/or entity to whom it is addressed. If you have received this notice in error, immediately call our SOP Department at (888) 705-7274.

RE: Loyal Source Government Services LLC

This receipt is to inform you that Registered Agent Solutions, Inc. has received a Service of Process on behalf of the above-referenced entity as your registered agent and is hereby forwarding the attached document(s) for your immediate review. A Summary of the service is shown below; however, it is important that you review the attached document(s) in their entirety for complete and detailed information.

For additional information and instruction, contact the document issuer: LOYR, APC

SERVICE INFORMATION

Service Date: 2024-04-15

Service Time: 3:23 PM PDT

Service Method: Process Server

RASi REFERENCE INFORMATION

Service No.: 0306717

RASi Office: CA

Rec. Int. Id.: AXS

CASE INFORMATION

Case Number: 24STCV09310

File Date: 04/15/2024

Jurisdiction: CALIFORNIA SUPERIOR COURT, LOS ANGELES COUNTY

Case Title: ELIZABETH MACIAS V. LOYAL SOURCE GOVERNMENT SERVICES LLC,

ANSWER / APPEARANCE INFORMATION

30 days

*(Be sure to review the document(s)
for any required response dates)*

AGENCY / PLAINTIFF INFORMATION

Firm/Issuing Agent: LOYR, APC

Attorney/Contact: ZACHARIAH E. MOURA

Location: California

Telephone No.: 213-318-5323

DOCUMENT(S) RECEIVED & ATTACHED

Complaint

Summons

Notice: OF CASE ASSIGNMENT - UNLIMITED CIVIL CASE

Demand for Jury Trial

OtherDetail: CIVIL CASE COVER SHEET & ADDENDUM

ADDITIONAL NOTES:

Questions? Should you have any questions or need additional assistance, please contact the SOP Department at (888) 705-7274.

You have been notified of this Service of Process by Insta-SOP Delivery, a secure email transmission. The transmitted documents have also been uploaded to your Compliance account. RASi offers additional methods of notification including Telephone Notification and FedEx Delivery. If you would like to update your account's notification preferences, please log into your Compliance account at www.rasi.com.

Thank you for your continued business!

SUM-100

SUMMONS ON FIRST AMENDED COMPLAINT (CITACION JUDICIAL)

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

**NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):**

LOYAL SOURCE GOVERNMENT SERVICES LLC, a Florida limited liability company; and DOES 1 through 50, inclusive

**YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**
ELIZABETH MACIAS, an individual

Electronically FILED by
Superior Court of California,
County of Los Angeles
4/15/2024 12:35 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By S. Bolden, Deputy Clerk

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es): Stanley Mosk Courthouse
111 N. Hill St., Los Angeles, CA 90012

CASE NUMBER:
(Número del Caso):
24STCV09310

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
Young W. Ryu, Esq., LOYR, APC, 1055 W. 7th Street, Suite 2290, Los Angeles, CA 90017, (213) 318-5323

DATE: ~~April 15, 2024~~ Clerk, by S. Bolden, Deputy
(Fecha) 04/15/2024 David W. Slayton, Executive Officer/Clerk of Court (Secretario) S. Bolden (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

[SEAL]



NOTICE TO THE PERSON SERVED: You are served

- ☐ as an individual defendant.
- ☐ as the person sued under the fictitious name of (specify):
- ☒ on behalf of (specify): Loyal Source Government Services LLC
under: ☒ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)
☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)
☐ other (specify):
- ☐ by personal delivery on (date):

Page 1 of 1

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Attorneys for Plaintiff ELIZABETH MACIAS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

ELIZABETH MACIAS, an individual,

Plaintiff,

v.

LOYAL SOURCE GOVERNMENT
SERVICES LLC, a Florida limited liability
company; and DOES 1 through 50, inclusive,

Defendants.

Case No.: 24STCV09310

**FIRST AMENDED COMPLAINT FOR
DAMAGES**

1. Employment Discrimination (Disability)
(Violation of Gov. Code § 12940(a))
2. Failure to Prevent Discrimination and
Retaliation (Violation of Gov. Code §
12940(k))
3. Failure to Provide Reasonable
Accommodation (Violation of Gov. Code
§ 12940(m))
4. Failure to Engage in a Timely, Good
Faith, Interactive Process (Violation of
Gov. Code § 12940(n))
5. Retaliation for Exercising Rights under
the FEHA (Violation of Gov. Code §
12940(h))
6. Wrongful Termination in Violation of
Public Policy

DEMAND FOR JURY TRIAL

1 Plaintiff ELIZABETH MACIAS (“PLAINTIFF”), an individual, complains and alleges as
2 follows:

3 **JURISDICTION AND VENUE**

4 1. The California Superior Court has jurisdiction over this action pursuant to
5 California Constitution Article VI, Section 10, which grants the Superior Court “original
6 jurisdiction in all causes except those given by statute to other trial courts.” The statutes under
7 which this action is brought do not specify any other basis for jurisdiction.

8 2. The California Superior Court has jurisdiction over DEFENDANTS because
9 Defendant LOYAL SOURCE GOVERNMENT SERVICES LLC (“LOYAL”) does business
10 within the State of California.

11 3. Pursuant to California Code of Civil Procedure section 395(a), venue is proper in
12 the County of Los Angeles because DEFENDANTS’ obligations and liability arose, at least in
13 part, therein, and because the alleged injuries sustained by PLAINTIFF occurred in the County of
14 Los Angeles.

15 **PARTIES**

16 4. PLAINTIFF is, and at all times herein relevant, was an individual and a resident of
17 the State of California. From on or around November 1, 2020, to on or around January 3, 2022,
18 PLAINTIFF was employed by DEFENDANTS.

19 5. PLAINTIFF is informed and believes, and upon such information and belief alleges
20 that, at all times herein relevant, LOYAL was the “employer” of PLAINTIFF within the meaning
21 of all applicable California state laws and statutes.

22 6. PLAINTIFF is informed and believes, and upon such information and belief alleges
23 that, at all times herein relevant, Defendants LOYAL and DOES 1 through 50, inclusive, and each
24 of them, were the agents, partners, joint venturers, joint employers, representatives, servants,
25 employees, successors-in-interest, co-conspirators, and assigns, each of the other, and all times
26 relevant hereto were acting within the course and scope of their authority as such agents, partners,
27 joint venturers, joint employers, representatives, servants, employees, successors-in-interest, co-
28 conspirators, and assigns, and all acts or omissions alleged herein were duly committed with the

1 ratification, knowledge, permission, encouragement, authorization, and consent of each defendant
2 designated herein.

3 7. The true names and capacities, whether corporate, associate, individual, or
4 otherwise, of defendants DOES 1 through 50, inclusive, are presently unknown to PLAINTIFF
5 who sues said defendants by such fictitious names. PLAINTIFF is informed and believes, and
6 upon such information and belief, alleges that each of the defendants designated as DOE is in some
7 manner responsible and liable for the wrongs and damages as alleged below, and in so acting, was
8 functioning as the agent, servant, partner, and employee of the codefendants; and in doing such
9 actions mentioned below, was acting within the course and scope of his or her authority as such
10 agent, servant, partner, and employee with the permission and consent of the codefendants.
11 PLAINTIFF will seek leave of court to amend this Complaint to show the true names and
12 capacities when the same have been ascertained.

13 8. Defendants LOYAL and DOES 1 through 50, inclusive, will be hereinafter
14 collectively referred to as "DEFENDANTS."

15 **EXHAUSTION OF ADMINISTRATIVE REMEDIES**

16 9. PLAINTIFF timely filed complaints against DEFENDANTS under Government
17 Code sections 12940, et seq., the California Fair Employment and Housing Act ("FEHA"), with
18 the California Civil Rights Department ("CRD"); and received a "Right to Sue" Notice from CRD
19 on April 12, 2024. As such, PLAINTIFF has satisfied the administrative prerequisites with respect
20 to all of her claims arising under the FEHA and all related filings.

21 **ALLEGATIONS COMMON TO ALL CAUSES OF ACTION**

22 10. From on or about November 1, 2020, and until DEFENDANTS wrongfully
23 terminated PLAINTIFF on or about January 4, 2022, DEFENDANTS employed PLAINTIFF as a
24 "Public Health Analyst". PLAINTIFF worked at the Tom Bradley International Terminal at LAX.

25 11. During PLAINTIFF's time working for DEFENDANTS, she experienced high
26 levels of stress due to DEFENDANTS' lack of staffing. PLAINTIFF would not be afforded her
27 required meal and rest breaks, and this was exacerbated by PLAINTIFF's pre-existing diabetes
28

1 condition. Additionally, PLAINTIFF and other employees would be forced to work overtime but
2 were not paid the elevated rate for any overtime hours worked.

3 12. When PLAINTIFF complained about the working conditions, one of her
4 supervisors told PLAINTIFF "You are old enough, you can handle it!"

5 13. PLAINTIFF and other employees of DEFENDANTS complained directly to site
6 supervisor Jessica V (last name unknown) ("Jessica") about not getting the breaks she was entitled
7 to, but Jessica did nothing to fix any of the issues.

8 14. PLAINTIFF's stress elevated to a level where she developed hives from the stress.
9 PLAINTIFF went to her doctor, who put her off work as she recovered. PLAINTIFF's last day of
10 work for DEFENDANTS was December 14, 2021.

11 15. PLAINTIFF attempted to provide DEFENDANTS her doctor's note before she
12 began her leave of absence. However, DEFENDANTS refused to accept PLAINTIFF's doctor
13 notes, and instead terminated her on January 4, 2022.

14 16. PLAINTIFF is informed and believes and based thereon alleges that
15 DEFENDANTS intentionally and willfully took the aforementioned adverse employment actions
16 and disparate treatment because of her actual or perceived disability and for exercising her rights.

17 17. DEFENDANTS have provided documents that claim they terminated PLAINTIFF
18 on or around June 21, 2022, hoping to avoid claims that they terminated PLAINTIFF due to her
19 disability. However, PLAINTIFF was terminated by email on January 5, 2022, effective January
20 3, 2022.

21 18. As a result of the aforementioned wrongful conduct by DEFENDANTS,
22 PLAINTIFF experienced, and continues to experience emotional distress.

23 19. As a result of the aforementioned adverse employment actions committed against
24 PLAINTIFF, PLAINTIFF experienced, and continues to experience, pain and suffering.

25 **FIRST CAUSE OF ACTION**

26 **EMPLOYMENT DISCRIMINATION (DISABILITY)**

27 **(Violation of California Government Code § 12940(a))**

28 **(By PLAINTIFF Against all DEFENDANTS)**

1 20. PLAINTIFF repeats and re-alleges the allegations set forth above, and incorporates
2 the same by reference as though fully set forth herein.

3 21. DEFENDANTS are “employers” within the meaning of, and are subject to the
4 FEHA, California Government Code sections 12900, et seq., as employers of five (5) or more
5 employees pursuant to section 12926, subdivision (d).

6 22. At all times relevant hereto, the FEHA was in full force and effect and was binding
7 upon DEFENDANTS.

8 23. As such term is used under the FEHA, “on the basis enumerated in this part” means
9 or refers to discrimination on the basis of one or more of the protected characteristics under the
10 FEHA.

11 24. Government Code sections 12926 and 12940, and the accompanying regulations
12 shall “be broadly construed to protect applicants and employees from discrimination due to an
13 actual or perceived physical or mental disability or mental condition that is disabling, potentially
14 disabling or perceived to be disabling or potentially disabling.” (2 Cal. Code Regs. § 11064(b).)
15 The term “disability . . . shall be construed broadly in favor of expansive coverage by the maximum
16 extent permitted by the terms of the [FEHA].” (*Id.*)

17 25. Government Code section 12940, subdivision (a) prohibits an employer from
18 discriminating against a person with a physical or mental disability and/or perceived disability,
19 whether in compensation or in terms, conditions, or privileges of employment.

20 26. The FEHA defines “disability” to include (1) “[h]aving a record or history of a
21 disease, disorder, condition, cosmetic disfigurement, anatomical loss, or health impairment [that
22 constitutes a physical disability], which is known to the employer”; (2) “[b]eing regarded or
23 treated by the employer . . . as having, or having had, any physical condition that makes
24 achievement of a major life activity difficult”; or (3) “[b]eing regarded or treated by the employer
25 . . . as having, or having had, a disease, disorder, condition, cosmetic disfigurement, anatomical
26 loss, or health impairment that has no present disabling effect but may become a physical
27 disability.” (Gov. Code § 12926, subd. (k)(3)–(5).) Under the “regarded as” theory, an actual or
28

existing disability is not necessary. (*Gelfo v. Lockheed Martin Corp.* (2006) 140 Cal.App.4th 34, 52-53.).

27. As detailed above and incorporated herein by reference, DEFENDANTS were made aware that PLAINTIFF suffered from disability conditions, namely diabetes, hives, and work-related stress. PLAINTIFF was able to perform her essential job duties with reasonable accommodation(s). As set forth above, PLAINTIFF is a person protected from discrimination on the basis of an actual and/or perceived disability under the FEHA.

28. PLAINTIFF was subjected to differential treatment and retaliation by DEFENDANTS because of her actual and/or perceived disability. PLAINTIFF's actual and/or perceived disability was a substantial motivating factor in DEFENDANTS terminating PLAINTIFF's employment.

29. PLAINTIFF is informed and believes and based thereon alleges that she was subjected to disparate treatment by DEFENDANTS based on her actual and/or perceived disability.

30. As a direct, legal, and proximate cause of PLAINTIFF's aforementioned status, DEFENDANTS discriminated against PLAINTIFF on the basis of her actual and/or perceived disability.

31. As a direct, foreseeable, and proximate result of DEFENDANTS' acts as alleged above, PLAINTIFF has suffered lost income, employment, and career opportunities, and has suffered and continues to suffer other economic losses, the precise amount of which will be proven at trial.

32. As a direct, foreseeable, and proximate result of DEFENDANTS' acts as alleged above, PLAINTIFF has suffered and continues to suffer pain and suffering, the precise amount of which will be proven at trial.

33. DEFENDANTS' conduct was a substantially motivating factor in causing aforementioned harm.

34. Under the FEHA, PLAINTIFF is entitled to an award of reasonable attorney's fees and costs.

Wherefore, PLAINTIFF prays for judgment as set forth below.

SECOND CAUSE OF ACTION

FAILURE TO PREVENT DISCRIMINATION AND RETALIATION

(Violation of California Government Code § 12940(k))

(By PLAINTIFF Against all DEFENDANTS)

35. DEFENDANTS, inclusive are “employers” within the meaning of, and are subject to the FEHA, Government Code sections 12900, et seq., as employers of five (5) or more employees pursuant to section 12926, subdivision (d).

36. At all relevant times, the FEHA, including in particular Government Code section 12940, subdivision (k), was in full force and effect and was binding upon DEFENDANTS.

37. “In accordance with ... the fundamental public policy of eliminating discrimination in the workplace under the FEHA, it has been concluded that retaliation is a form of discrimination actionable under California Government Code section 12940(k).” (See *Taylor v. City of Los Angeles Dept. of Water & Power* (2006) 144 Cal.App.4th 1216, 1240, disapproved on other grounds in *Jones v. The Lodge at Torrey Pines Partnership* (2008) 42 Cal. 4th 1158.)

38. FEHA requires employers to take all reasonable steps to prevent discrimination and retaliation including the institution by employer of policies, procedures and practices that include prompt and effective remedial procedures, and appropriate training, monitoring and disciplinary measures. (See Gov. Code §§ 12940 (j)–(k).)

39. DEFENDANTS’ policies, procedures and practices were inadequate for prevention, monitoring and remediation of discrimination and retaliation. To the extent that any such policies, procedures and practices existed, employees, including supervisors, were insufficiently trained or made aware of those policies and procedures for the policies and procedures to prevent discrimination and retaliation from occurring. Once DEFENDANTS were made aware of discriminatory and retaliatory conduct by a supervisor, they failed to take measures to prevent discrimination and retaliation against PLAINTIFF.

40. As a direct, foreseeable, and proximate result of DEFENDANTS’ acts as alleged above, PLAINTIFF has suffered lost income, employment, and career opportunities, and has

suffered and continues to suffer other economic losses, the precise amount of which will be proven at trial.

41. As a direct, foreseeable, and proximate result of DEFENDANTS' conduct, as alleged above, PLAINTIFF has suffered and continues to suffer pain and suffering, the precise amount of which will be proven at trial.

42. DEFENDANTS' conduct was a substantially motivating factor in causing aforementioned harm.

43. Under the FEHA, PLAINTIFF is entitled to an award of reasonable attorney's fees and costs.

Wherefore, PLAINTIFF prays for judgment as set forth below.

THIRD CAUSE OF ACTION

FAILURE TO PROVIDE REASONABLE ACCOMMODATION

(Violation of California Government Code § 12940(m))

(By PLAINTIFF Against all DEFENDANTS)

44. PLAINTIFF repeats and re-alleges the allegations set forth above and incorporates the same by reference as though fully set forth herein.

45. DEFENDANTS are "employers" within the meaning of, and subject to the FEHA, California Government Code sections 12900, et seq., as employers of five (5) or more employees pursuant to section 12926, subdivision (d).

46. At all times relevant hereto, the FEHA, in particular Government Code sections 12940, 12945 and 12926, was in full force and effect and was binding upon DEFENDANTS.

47. Government Code section 12940, subdivision (m) provides that it is an unlawful employment practice "[f]or an employer . . . to fail to make reasonable accommodation for the known physical or mental disability of an applicant or employee."

48. Government Code section 12945, subdivision (a)(3)(A) also provides that it is an unlawful employment practice "[f]or an employer . . . to refuse to provide reasonable accommodation for an employee for a condition related medical condition, if the employee so requests, with the advice of the employee's health care provider."

1 49. Government Code section 12926, subdivision (p) provides that reasonable
2 accommodation may include either of the following: (1) making existing facilities used by
3 employees readily accessible to, and usable by, individuals with disabilities; or (2) job restricting,
4 part-time or modified work schedules, reassignment to a vacant position, acquisition or
5 modification of equipment or devises, adjustment or modifications of examinations, training
6 materials or policies, the provision of qualified readers or interpreters, and other similar
7 accommodations for individuals with disabilities.

8 50. An employer “is required to consider any and all reasonable accommodations of
9 which it is aware or that are brought to its attention” by an employee, unless they pose an undue
10 hardship. (Cal. Code Regs., tit. 2, § 11068(e).)

11 51. The employer “shall consider the preference of the applicant or employee to be
12 accommodated, but has the right to select and implement an accommodation that is effective for
13 both the employee and the employer or other covered entity.” (*Id.*)

14 52. Unless the employer proves an undue hardship, “[a]n individual with a record of a
15 disability may be entitled . . . to a reasonable accommodation if needed and related to the residual
16 effects of the disability. For example, an employee may need a leave or a schedule change to
17 permit him or her to attend follow-up or monitoring appointments with a health care provider”
18 (Cal. Code Regs., tit. 2, § 11068(g)).

19 53. As detailed above and incorporated herein by reference, DEFENDANTS, were
20 made aware that PLAINTIFF suffered from a disability. PLAINTIFF was able to perform her
21 essential job duties with or without reasonable accommodation(s).

22 54. DEFENDANTS failed to reasonably accommodate PLAINTIFF, including, but not
23 limited to, retaliating against her.

24 55. As a direct, foreseeable, and proximate result of DEFENDANTS’ acts as alleged
25 above, PLAINTIFF has suffered lost income, employment, and career opportunities, and has
26 suffered and continues to suffer other economic losses, the precise amount of which will be proven
27 at trial.

63. Furthermore, if there is a need to “identify or implement an effective, reasonable accommodation for an employee or applicant with a disability, the FEHA requires *a timely, good faith, interactive process* between an employer or other covered entity and an applicant, employee, or the individual’s representative, with a known physical or mental disability or medical condition.” (Cal. Code Regs., tit. 2, § 11069(a).) During such an interactive process, both the employer and the employee, or his or her representative, must exchange “essential information identified” in title 2, section 11069 of the California Code of Regulations, “*without delay or obstruction of the process.*” (*Id.* [emphasis added].)

64. An employer is required to initiate an interactive process when:

(1) an applicant or employee with a known physical or mental disability or medical condition requests reasonable accommodations;

(2) the employer . . . becomes aware of the need for an accommodation through a third party or by observation; or

(3) the employer . . . becomes aware of the possible need for an accommodation because the employee with a disability has exhausted leave under the California Worker’s Compensation Act, for the employee’s own serious health condition under the CFRA and/or the [Family Medical Leave Act] . . . and yet the employee or the employee’s health care provider indicates that further accommodation is still necessary for recuperative leave or other accommodation for the employee to perform the essential functions of the job.” (Cal. Code Regs., tit. 2, § 11069(b).)

65. An employer is required to follow the procedures outlined in Title 2, sections 11069, subdivisions (c)(1) through (c)(9) of the California Code of Regulations when engaging in the interactive process and assessing whether an employee may be accommodated through an alternate position or any other potential accommodations. This requirement to engage in a timely, good faith interactive process also applies in circumstances in which an employer perceives and/or regards an employee as disabled. (*Gelfo v. Lockheed Martin Corp.* (2006) 140 Cal.App.4th 34, 61).

66. As detailed above and incorporated herein by reference, DEFENDANTS were made aware that PLAINTIFF suffered from disability conditions. PLAINTIFF was able to perform her essential job duties with reasonable accommodation(s).

67. In violation of California Government Code Section 12940(n) and the aforementioned regulations, DEFENDANTS failed to engage in a timely, good faith, interactive process with PLAINTIFF to determine effective reasonable accommodations regarding her disability. Instead, DEFENDANTS subjected PLAINTIFF to adverse employment actions.

68. As a direct and proximate result of the above-described acts of DEFENDANTS, PLAINTIFF has suffered lost income, employment, and career opportunities, and has suffered and continues to suffer other economic losses, the precise amount of which will be proven at trial.

69. As a direct, foreseeable, and proximate result of DEFENDANTS' acts as alleged above, PLAINTIFF has suffered and continues to suffer pain and suffering, the precise amount of which will be proven at trial.

70. DEFENDANTS' failure to participate in a timely good-faith interactive process with PLAINTIFF was a substantially motivating factor in causing aforementioned harm.

71. Under the FEHA, PLAINTIFF is entitled to an award of reasonable attorney's fees and costs.

Wherefore, PLAINTIFF prays for judgment as set forth below.

FIFTH CAUSE OF ACTION

RETALIATION FOR EXERCISING RIGHTS UNDER THE FEHA

(Violation of California Government Code § 12940(h))

(By PLAINTIFF Against all DEFENDANTS)

72. PLAINTIFF repeats and re-alleges the allegations set forth above and incorporates the same by reference as though fully set forth herein.

73. DEFENDANTS are "employers" within the meaning of, and are subject to the FEHA, California Government Code sections 12900, et seq., as employers of five (5) or more employees pursuant to section 12926, subdivision (d).

74. At all times relevant hereto, the FEHA, including in particular California Government Code section 12940, subdivision (h), was in full force and effect and was binding upon DEFENDANTS.

75. California Government Code section 12940, subdivision (h) prohibits covered employers and/or persons from retaliating against employees for exercising any rights under the FEHA.

76. PLAINTIFF exercised her rights under the FEHA and engaged in legally protected activity including by giving DEFENDANTS doctor's notes outlining her medical conditions and requesting reasonable work accommodations. Here, PLAINTIFF is informed and believes that DEFENDANTS retaliated against her.

77. As a direct, foreseeable, and proximate result of DEFENDANTS' acts, as alleged above, PLAINTIFF has suffered lost income, employment, and career opportunities, and has suffered and continues to suffer other economic losses, the precise amount of which will be proven at trial.

78. As a direct, foreseeable, and proximate result of DEFENDANTS' conduct, as alleged above, PLAINTIFF has suffered and continues to suffer pain and suffering, the precise amount of which will be proven at trial.

79. DEFENDANTS' conduct was a substantially motivating factor in causing aforementioned harm.

80. Under the FEHA, PLAINTIFF is entitled to an award of reasonable attorney's fees and costs.

Wherefore, PLAINTIFF prays for judgment as set forth below.

SIXTH CAUSE OF ACTION

WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY

(By PLAINTIFF Against all DEFENDANTS)

81. PLAINTIFF repeats and re-alleges the allegations set forth above, and incorporates the same by reference as though fully set forth herein.

82. PLAINTIFF was employed by DEFENDANTS at all times herein.

83. DEFENDANTS terminated PLAINTIFF's employment as described above because of her actual or perceived disability, and because of her exercising the rights under the FEHA. These acts by DEFENDANTS were in violation of public policy of the State of California

inter alia as evidenced by Article I, §1, of the California Constitution, as well as enactment of the California Fair Employment Housing Act (Government Code Section 12900, et seq.).

84. As a direct, foreseeable, and proximate result of DEFENDANTS' conduct, as alleged above, PLAINTIFF has suffered lost income, employment, and career opportunities, and has suffered and continues to suffer other economic losses, the precise amount of which will be proven at trial.

85. As a direct, foreseeable, and proximate result of DEFENDANTS' conduct, as alleged above, PLAINTIFF has suffered and continues to suffer pain and suffering, the precise amount of which will be proven at trial.

86. As a result of the foregoing conduct of DEFENDANTS, PLAINTIFF incurred and continues to incur attorneys' fees and costs. PLAINTIFF is entitled to, and demands, an award of reasonable attorney's fees pursuant to California Code of Civil Procedure section 1021.5.

PRAYER FOR RELIEF

WHEREFORE, PLAINTIFF prays for judgment against DEFENDANTS, and each of them, as follows:

1. For a money judgment representing compensatory damages, including lost wages, loss of earning potential, employee benefits, and all other sums of money, together with interest on these amounts; for other special damages; and for general damages for pain and suffering;

2. For a declaratory relief reaffirming PLAINTIFF's equal standing under the law and condemning DEFENDANTS' discriminatory and retaliatory practices;

3. For injunctive relief preventing and barring DEFENDANTS' discriminatory and retaliatory employment policies and practices in the future;

4. For prejudgment interest on each of the foregoing at the legal rate from the date on which the obligation became due through the date of judgment in this matter;

5. For post-judgment interest;

6. For reasonable attorneys' fees, pursuant to Government Code section 12965, California Code of Civil Procedure section 1021.5; and/or any other basis;

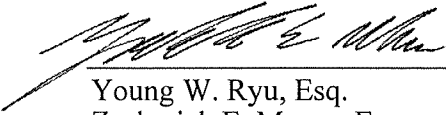
1 7. For costs of suit incurred herein, including expert witness fees pursuant to The
2 FEHA, and/or any other basis; and

3 8. For any other relief that is just and proper.

4 Respectfully submitted,

5
6 Dated: April 15, 2024

LOYR, APC

7
8 
9 Young W. Ryu, Esq.
10 Zachariah E. Moura, Esq.
11 Kee Seok Mah, Esq.
12 Harley Phleger, Esq.
13 Attorney for Plaintiff ELIZABETH MACIAS

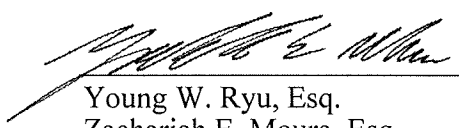
DEMAND FOR JURY TRIAL

PLAINTIFF demands a trial by jury as to all issues so triable.

Respectfully submitted,

Dated: April 15, 2024

LOYR, APC



Young W. Ryu, Esq.
Zachariah E. Moura, Esq.
Kee Seok Mah, Esq.
Harley Phleger, Esq.
Attorney for Plaintiff ELIZABETH MACIAS

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Young W. Ryu, Esq. (SBN 266372); Zachariah E. Moura, Esq. (SBN 279508) LOYR, APC, 1055 W 7th Street, Suite 2290, Los Angeles, CA 90017		FOR COURT USE ONLY Electronically FILED by Superior Court of California, County of Los Angeles 4/12/2024 4:54 PM David W. Slayton, Executive Officer/Clerk of Court, By A. Munoz, Deputy Clerk	
TELEPHONE NO.: (213) 318-5323 FAX NO.: (800) 576-1170 EMAIL ADDRESS: zach.moura@loywr.com ATTORNEY FOR (Name): Plaintiff ELIZABETH MACIAS			
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: 111 N. Hill Street CITY AND ZIP CODE: Los Angeles 90012 BRANCH NAME: Stanley Mosk Courthouse			
CASE NAME: ELIZABETH MACIAS v. LOYAL SOURCE GOVERNMENT SERVICES, et al.			
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$35,000) <input type="checkbox"/> Limited (Amount demanded is \$35,000 or less)		Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	CASE NUMBER: 24STCV09310 JUDGE: DEPT.:

Items 1–6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:		
Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) Non-PI/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) Employment <input checked="" type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400–3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)

2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties | d. <input type="checkbox"/> Large number of witnesses |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence | f. <input type="checkbox"/> Substantial postjudgment judicial supervision |
3. Remedies sought (check all that apply): a. ☒ monetary b. ☒ nonmonetary; declaratory or injunctive relief c. ☒ punitive
4. Number of causes of action (specify): Six (6)
5. This case ☐ is ☒ is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: April 12, 2024

Zachariah E. Moura

(TYPE OR PRINT NAME)

NOTICE

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

CM-010

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you **must** complete and file, along with your first paper, the Civil Case Cover Sheet contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the Civil Case Cover Sheet to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort

Auto (22)—Personal Injury/Property Damage/Wrongful Death
Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

Asbestos (04)
Asbestos Property Damage
Asbestos Personal Injury/
Wrongful Death
Product Liability (*not asbestos or toxic/environmental*) (24)
Medical Malpractice (45)
Medical Malpractice—
Physicians & Surgeons
Other Professional Health Care
Malpractice

Other PI/PD/WD (23)
Premises Liability (e.g., slip and fall)
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
Intentional Infliction of Emotional Distress
Negligent Infliction of Emotional Distress
Other PI/PD/WD

Non-PI/PD/WD (Other) Tort

Business Tort/Unfair Business Practice (07)
Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)
Defamation (e.g., slander, libel) (13)
Fraud (16)
Intellectual Property (19)
Professional Negligence (25)
Legal Malpractice
Other Professional Malpractice (*not medical or legal*)
Other Non-PI/PD/WD Tort (35)

Employment

Wrongful Termination (36)
Other Employment (15)

Contract

Breach of Contract/Warranty (06)
Breach of Rental/Lease
Contract (*not unlawful detainer or wrongful eviction*)
Contract/Warranty Breach—Seller Plaintiff (*not fraud or negligence*)
Negligent Breach of Contract/
Warranty
Other Breach of Contract/Warranty
Collections (e.g., money owed, open book accounts) (09)
Collection Case—Seller Plaintiff
Other Promissory Note/Collections Case
Insurance Coverage (*not provisionally complex*) (18)
Auto Subrogation
Other Coverage
Other Contract (37)
Contractual Fraud
Other Contract Dispute

Real Property

Eminent Domain/Inverse
Condemnation (14)
Wrongful Eviction (33)
Other Real Property (e.g., quiet title) (26)
Writ of Possession of Real Property
Mortgage Foreclosure
Quiet Title
Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

Unlawful Detainer

Commercial (31)
Residential (32)
Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

Judicial Review

Asset Forfeiture (05)
Petition Re: Arbitration Award (11)
Writ of Mandate (02)
Writ—Administrative Mandamus
Writ—Mandamus on Limited Court Case Matter
Writ—Other Limited Court Case Review
Other Judicial Review (39)
Review of Health Officer Order
Notice of Appeal—Labor Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

Antitrust/Trade Regulation (03)
Construction Defect (10)
Claims Involving Mass Tort (40)
Securities Litigation (28)
Environmental/Toxic Tort (30)
Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

Enforcement of Judgment

Enforcement of Judgment (20)
Abstract of Judgment (Out of County)
Confession of Judgment (*non-domestic relations*)
Sister State Judgment
Administrative Agency Award (*not unpaid taxes*)
Petition/Certification of Entry of Judgment on Unpaid Taxes
Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

RICO (27)
Other Complaint (*not specified above*) (42)
Declaratory Relief Only
Injunctive Relief Only (*non-harassment*)
Mechanics Lien
Other Commercial Complaint Case (*non-tort/non-complex*)
Other Civil Complaint (*non-tort/non-complex*)

Miscellaneous Civil Petition

Partnership and Corporate Governance (21)
Other Petition (*not specified above*) (43)
Civil Harassment
Workplace Violence
Elder/Dependent Adult Abuse
Election Contest
Petition for Name Change
Petition for Relief From Late Claim
Other Civil Petition

Electronically FILED by
Superior Court of California,
County of Los Angeles

4/12/2024 4:54 PM

David W. Slayton,
Executive Officer/Clerk of Court,
By A. Munoz, Deputy Clerk

SHORT TITLE

ELIZABETH MACIAS v. LOYAL SOURCE GOVERNMENT SERVICES, et al.

CASE NUMBER

24STCV09310

CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION

(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)

This form is required pursuant to Local Rule 2.3 in all new civil case filings in the Los Angeles Superior Court

Step 1: After completing the Civil Case Cover Sheet (Judicial Council form CM-010), find the exact case type in Column A that corresponds to the case type indicated in the Civil Case Cover Sheet.

Step 2: In Column B, check the box for the type of action that best describes the nature of the case.

Step 3: In Column C, circle the number which explains the reason for the court filing location you have chosen.

Applicable Reasons for Choosing Courthouse Location (Column C)

1. Class Actions must be filed in the Stanley Mosk Courthouse, Central District.	7. Location where petitioner resides.
2. Permissive filing in Central District.	8. Location wherein defendant/respondent functions wholly.
3. Location where cause of action arose.	9. Location where one or more of the parties reside.
4. Location where bodily injury, death or damage occurred.	10. Location of Labor Commissioner Office.
5. Location where performance required, or defendant resides.	11. Mandatory filing location (Hub Cases – unlawful detainer, limited non-collection, limited collection).
6. Location of property or permanently garaged vehicle.	

	A Civil Case Cover Sheet Case Type	B Type of Action (check only one)	C Applicable Reasons (see Step 3 above)
Auto Tort	Auto (22)	<input type="checkbox"/> 2201 Motor Vehicle – Personal Injury/Property Damage/Wrongful Death	1, 4
	Uninsured Motorist (46)	<input type="checkbox"/> 4601 Uninsured Motorist – Personal Injury/Property Damage/Wrongful Death	1, 4
Other Personal Injury/ Property Damage/ Wrongful Death	Other Personal Injury/ Property Damage/ Wrongful Death (23)	<input type="checkbox"/> 2301 Premise Liability (e.g., dangerous conditions of property, slip/trip and fall, dog attack, etc.)	1, 4
		<input type="checkbox"/> 2302 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, battery, vandalism, etc.)	1, 4
		<input type="checkbox"/> 2303 Intentional Infliction of Emotional Distress	1, 4
		<input type="checkbox"/> 2304 Other Personal Injury/Property Damage/Wrongful Death	1, 4
		<input type="checkbox"/> 2305 Elder/Dependent Adult Abuse/Claims Against Skilled Nursing Facility	1, 4
		<input type="checkbox"/> 2306 Intentional Conduct – Sexual Abuse Case (in any form)	1, 4

SHORT TITLE ELIZABETH MACIAS v. LOYAL SOURCE GOVERNMENT SERVICES, et al.	CASE NUMBER
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	A Civil Case Cover Sheet Case Type	B Type of Action (check only one)	C Applicable Reasons (see Step 3 above)
		<input type="checkbox"/> 2307 Construction Accidents	1, 4
		<input type="checkbox"/> 2308 Landlord – Tenant Habitability (e.g., bed bugs, mold, etc.)	1, 4
Other Personal Injury/ Property Damage/ Wrongful Death	Product Liability (24)	<input type="checkbox"/> 2401 Product Liability (not asbestos or toxic/ environmental)	1, 4
		<input type="checkbox"/> 2402 Product Liability – Song-Beverly Consumer Warranty Act (CA Civil Code §§1790-1795.8) (Lemon Law)	1, 3, 5
	Medical Malpractice (45)	<input type="checkbox"/> 4501 Medical Malpractice – Physicians & Surgeons	1, 4
		<input type="checkbox"/> 4502 Other Professional Health Care Malpractice	1, 4
Non-Personal Injury/Property Damage/Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> 0701 Other Commercial/Business Tort (not fraud or breach of contract)	1, 2, 3
	Civil Rights (08)	<input type="checkbox"/> 0801 Civil Rights/Discrimination	1, 2, 3
	Defamation (13)	<input type="checkbox"/> 1301 Defamation (slander/libel)	1, 2, 3
	Fraud (16)	<input type="checkbox"/> 1601 Fraud (no contract)	1, 2, 3
	Professional Negligence (25)	<input type="checkbox"/> 2501 Legal Malpractice	1, 2, 3
		<input type="checkbox"/> 2502 Other Professional Malpractice (not medical or legal)	1, 2, 3
	Other (35)	<input type="checkbox"/> 3501 Other Non-Personal Injury/Property Damage Tort	1, 2, 3
Employment	Wrongful Termination (36)	<input checked="" type="checkbox"/> 3601 Wrongful Termination	1, 2, 3
	Other Employment (15)	<input type="checkbox"/> 1501 Other Employment Complaint Case	1, 2, 3
		<input type="checkbox"/> 1502 Labor Commissioner Appeals	10
Contract	Breach of Contract / Warranty (06) (not insurance)	<input type="checkbox"/> 0601 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction)	2, 5
		<input type="checkbox"/> 0602 Contract/Warranty Breach – Seller Plaintiff (no fraud/negligence)	2, 5
		<input type="checkbox"/> 0603 Negligent Breach of Contract/Warranty (no fraud)	1, 2, 5
		<input type="checkbox"/> 0604 Other Breach of Contract/Warranty (no fraud/ negligence)	1, 2, 5
		<input type="checkbox"/> 0605 Breach of Rental/Lease Contract (COVID-19 Rental Debt)	2, 5
	Collections (09)	<input type="checkbox"/> 0901 Collections Case – Seller Plaintiff	5, 6, 11
		<input type="checkbox"/> 0902 Other Promissory Note/Collections Case	5, 11
		<input type="checkbox"/> 0903 Collections Case – Purchased Debt (charged off consumer debt purchased on or after January 1, 2014)	5, 6, 11
		<input type="checkbox"/> 0904 Collections Case – COVID-19 Rental Debt	5, 11
	Insurance Coverage (18)	<input type="checkbox"/> 1801 Insurance Coverage (not complex)	1, 2, 5, 8

SHORT TITLE ELIZABETH MACIAS v. LOYAL SOURCE GOVERNMENT SERVICES, et al.	CASE NUMBER
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	A Civil Case Cover Sheet Case Type	B Type of Action (check only one)	C Applicable Reasons (see Step 3 above)
Contract (Continued)	Other Contract (37)	<input type="checkbox"/> 3701 Contractual Fraud	1, 2, 3, 5
		<input type="checkbox"/> 3702 Tortious Interference	1, 2, 3, 5
		<input type="checkbox"/> 3703 Other Contract Dispute (not breach/insurance/fraud/negligence)	1, 2, 3, 8, 9
Real Property	Eminent Domain/ Inverse Condemnation (14)	<input type="checkbox"/> 1401 Eminent Domain/Condemnation Number of Parcels _____	2, 6
	Wrongful Eviction (33)	<input type="checkbox"/> 3301 Wrongful Eviction Case	2, 6
	Other Real Property (26)	<input type="checkbox"/> 2601 Mortgage Foreclosure	2, 6
		<input type="checkbox"/> 2602 Quiet Title	2, 6
		<input type="checkbox"/> 2603 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2, 6
Unlawful Detainer	Unlawful Detainer – Commercial (31)	<input type="checkbox"/> 3101 Unlawful Detainer – Commercial (not drugs or wrongful eviction)	6, 11
	Unlawful Detainer – Residential (32)	<input type="checkbox"/> 3201 Unlawful Detainer – Residential (not drugs or wrongful eviction)	6, 11
	Unlawful Detainer – Post Foreclosure (34)	<input type="checkbox"/> 3401 Unlawful Detainer – Post Foreclosure	2, 6, 11
	Unlawful Detainer – Drugs (38)	<input type="checkbox"/> 3801 Unlawful Detainer – Drugs	2, 6, 11
Judicial Review	Asset Forfeiture (05)	<input type="checkbox"/> 0501 Asset Forfeiture Case	2, 3, 6
	Petition re Arbitration (11)	<input type="checkbox"/> 1101 Petition to Compel/Confirm/Vacate Arbitration	2, 5
	Writ of Mandate (02)	<input type="checkbox"/> 0201 Writ – Administrative Mandamus	2, 8
		<input type="checkbox"/> 0202 Writ – Mandamus on Limited Court Case Matter	2
		<input type="checkbox"/> 0203 Writ – Other Limited Court Case Review	2
	Other Judicial Review (39)	<input type="checkbox"/> 3901 Other Writ/Judicial Review	2, 8
		<input type="checkbox"/> 3902 Administrative Hearing	2, 8
<input type="checkbox"/> 3903 Parking Appeal		2, 8	
Provisionally Complex Litigation	Antitrust/Trade Regulation (03)	<input type="checkbox"/> 0301 Antitrust/Trade Regulation	1, 2, 8
	Asbestos (04)	<input type="checkbox"/> 0401 Asbestos Property Damage	1, 11
		<input type="checkbox"/> 0402 Asbestos Personal Injury/Wrongful Death	1, 11

SHORT TITLE ELIZABETH MACIAS v. LOYAL SOURCE GOVERNMENT SERVICES, et al.	CASE NUMBER
---	-------------

	A Civil Case Cover Sheet Case Type	B Type of Action (check only one)	C Applicable Reasons (see Step 3 above)
Provisionally Complex Litigation (Continued)	Construction Defect (10)	<input type="checkbox"/> 1001 Construction Defect	1, 2, 3
	Claims Involving Mass Tort (40)	<input type="checkbox"/> 4001 Claims Involving Mass Tort	1, 2, 8
	Securities Litigation (28)	<input type="checkbox"/> 2801 Securities Litigation Case	1, 2, 8
	Toxic Tort Environmental (30)	<input type="checkbox"/> 3001 Toxic Tort/Environmental	1, 2, 3, 8
	Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> 4101 Insurance Coverage/Subrogation (complex case only)	1, 2, 5, 8
Enforcement of Judgment	Enforcement of Judgment (20)	<input type="checkbox"/> 2001 Sister State Judgment	2, 5, 11
		<input type="checkbox"/> 2002 Abstract of Judgment	2, 6
		<input type="checkbox"/> 2004 Administrative Agency Award (not unpaid taxes)	2, 8
		<input type="checkbox"/> 2005 Petition/Certificate for Entry of Judgment Unpaid Tax	2, 8
		<input type="checkbox"/> 2006 Other Enforcement of Judgment Case	2, 8, 9
Miscellaneous Civil Complaints	RICO (27)	<input type="checkbox"/> 2701 Racketeering (RICO) Case	1, 2, 8
	Other Complaints (not specified above) (42)	<input type="checkbox"/> 4201 Declaratory Relief Only	1, 2, 8
		<input type="checkbox"/> 4202 Injunctive Relief Only (not domestic/harassment)	2, 8
		<input type="checkbox"/> 4203 Other Commercial Complaint Case (non-tort/noncomplex)	1, 2, 8
		<input type="checkbox"/> 4204 Other Civil Complaint (non-tort/non-complex)	1, 2, 8
Miscellaneous Civil Petitions	Partnership Corporation Governance (21)	<input type="checkbox"/> 2101 Partnership and Corporation Governance Case	2, 8
	Other Petitions (not specified above) (43)	<input type="checkbox"/> 4301 Civil Harassment with Damages	2, 3, 9
		<input type="checkbox"/> 4302 Workplace Harassment with Damages	2, 3, 9
		<input type="checkbox"/> 4303 Elder/Dependent Adult Abuse Case with Damages	2, 3, 9
		<input type="checkbox"/> 4304 Election Contest	2
		<input type="checkbox"/> 4305 Petition for Change of Name/Change of Gender	2, 7
		<input type="checkbox"/> 4306 Petition for Relief from Late Claim Law	2, 3, 8
		<input type="checkbox"/> 4307 Other Civil Petition	2, 9

SHORT TITLE ELIZABETH MACIAS v. LOYAL SOURCE GOVERNMENT SERVICES, et al.	CASE NUMBER
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Step 4: Statement of Reason and Address: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address, which is the basis for the filing location including zip code. (No address required for class action cases.)

REASON: <input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input checked="" type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. <input type="checkbox"/> 11			ADDRESS: 1 World Way
CITY: Los Angeles	STATE: CA	ZIP CODE: 90045	

Step 5: Certification of Assignment: I certify that this case is properly filed in the Central District of the Superior Court of California, County of Los Angeles [Code of Civ. Proc., 392 et seq., and LASC Local Rule 2.3(a)(1)(E)]

Dated: 04/12/2024


 (SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form LASC CIV 109 (01/23).
5. Payment in full of the filing fee, unless there is a court order for waiver, partial or schedule payments.
6. A signed order appointing a Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court to issue a Summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the Summons and Complaint, or other initiating pleading in the case.

SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES	<small>Reserved for Clerk's File Stamp</small> FILED Superior Court of California County of Los Angeles 04/12/2024 David W. Slayton, Executive Officer / Clerk of Court By: <u>A. Munoz</u> Deputy
COURTHOUSE ADDRESS: Stanley Mosk Courthouse 111 North Hill Street, Los Angeles, CA 90012	
NOTICE OF CASE ASSIGNMENT UNLIMITED CIVIL CASE	
Your case is assigned for all purposes to the judicial officer indicated below.	CASE NUMBER: 24STCV09310

THIS FORM IS TO BE SERVED WITH THE SUMMONS AND COMPLAINT

	ASSIGNED JUDGE	DEPT	ROOM		ASSIGNED JUDGE	DEPT	ROOM
✓	Christopher K. Lui	76					

Given to the Plaintiff/Cross-Complainant/Attorney of Record David W. Slayton, Executive Officer / Clerk of Court
 on 04/15/2024 (Date) By A. Munoz, Deputy Clerk

INSTRUCTIONS FOR HANDLING UNLIMITED CIVIL CASES

The following critical provisions of the California Rules of Court, Title 3, Division 7, as applicable in the Superior Court, are summarized for your assistance.

APPLICATION

The Division 7 Rules were effective January 1, 2007. They apply to all general civil cases.

PRIORITY OVER OTHER RULES

The Division 7 Rules shall have priority over all other Local Rules to the extent the others are inconsistent.

CHALLENGE TO ASSIGNED JUDGE

A challenge under Code of Civil Procedure Section 170.6 must be made within 15 days after notice of assignment for all purposes to a judge, or if a party has not yet appeared, within 15 days of the first appearance.

TIME STANDARDS

Cases assigned to the Independent Calendaring Courts will be subject to processing under the following time standards:

COMPLAINTS

All complaints shall be served within 60 days of filing and proof of service shall be filed within 90 days.

CROSS-COMPLAINTS

Without leave of court first being obtained, no cross-complaint may be filed by any party after their answer is filed. Cross-complaints shall be served within 30 days of the filing date and a proof of service filed within 60 days of the filing date.

STATUS CONFERENCE

A status conference will be scheduled by the assigned Independent Calendar Judge no later than 270 days after the filing of the complaint. Counsel must be fully prepared to discuss the following issues: alternative dispute resolution, bifurcation, settlement, trial date, and expert witnesses.

FINAL STATUS CONFERENCE

The Court will require the parties to attend a final status conference not more than 10 days before the scheduled trial date. All parties shall have motions in limine, bifurcation motions, statements of major evidentiary issues, dispositive motions, requested form jury instructions, special jury instructions, and special jury verdicts timely filed and served prior to the conference. These matters may be heard and resolved at this conference. At least five days before this conference, counsel must also have exchanged lists of exhibits and witnesses, and have submitted to the court a brief statement of the case to be read to the jury panel as required by Chapter Three of the Los Angeles Superior Court Rules.

SANCTIONS

The court will impose appropriate sanctions for the failure or refusal to comply with Chapter Three Rules, orders made by the Court, and time standards or deadlines established by the Court or by the Chapter Three Rules. Such sanctions may be on a party, or if appropriate, on counsel for a party.

This is not a complete delineation of the Division 7 or Chapter Three Rules, and adherence only to the above provisions is therefore not a guarantee against the imposition of sanctions under Trial Court Delay Reduction. Careful reading and compliance with the actual Chapter Rules is imperative.

Class Actions

Pursuant to Local Rule 2.3, all class actions shall be filed at the Stanley Mosk Courthouse and are randomly assigned to a complex judge at the designated complex courthouse. If the case is found not to be a class action it will be returned to an Independent Calendar Courtroom for all purposes.

***Provisionally Complex Cases**

Cases filed as provisionally complex are initially assigned to the Supervising Judge of complex litigation for determination of complex status. If the case is deemed to be complex within the meaning of California Rules of Court 3.400 et seq., it will be randomly assigned to a complex judge at the designated complex courthouse. If the case is found not to be complex, it will be returned to an Independent Calendar Courtroom for all purposes.



Superior Court of California, County of Los Angeles

ALTERNATIVE DISPUTE RESOLUTION (ADR) INFORMATION PACKAGE

THE PLAINTIFF MUST SERVE THIS ADR INFORMATION PACKAGE ON EACH PARTY WITH THE COMPLAINT.

CROSS-COMPLAINANTS must serve this ADR Information Package on any new parties named to the action with the cross-complaint.

What is ADR?

ADR helps people find solutions to their legal disputes without going to trial. The main types of ADR are negotiation, mediation, arbitration, and settlement conferences. When ADR is done by phone, videoconference or computer, it may be called Online Dispute Resolution (ODR). These alternatives to litigation and trial are described below.

Advantages of ADR

- **Saves Time:** ADR is faster than going to trial.
- **Saves Money:** Parties can save on court costs, attorney's fees, and witness fees.
- **Keeps Control** (with the parties): Parties choose their ADR process and provider for voluntary ADR.
- **Reduces Stress/Protects Privacy:** ADR is done outside the courtroom, in private offices, by phone or online.

Disadvantages of ADR

- **Costs:** If the parties do not resolve their dispute, they may have to pay for ADR, litigation, and trial.
- **No Public Trial:** ADR does not provide a public trial or decision by a judge or jury.

Main Types of ADR

1. **Negotiation:** Parties often talk with each other in person, or by phone or online about resolving their case with a settlement agreement instead of a trial. If the parties have lawyers, they will negotiate for their clients.
2. **Mediation:** In mediation, a neutral mediator listens to each person's concerns, helps them evaluate the strengths and weaknesses of their case, and works with them to try to create a settlement agreement that is acceptable to all. Mediators do not decide the outcome. Parties may go to trial if they decide not to settle.

Mediation may be appropriate when the parties

- want to work out a solution but need help from a neutral person.
- have communication problems or strong emotions that interfere with resolution.

Mediation may not be appropriate when the parties

- want a public trial and want a judge or jury to decide the outcome.
- lack equal bargaining power or have a history of physical/emotional abuse.

How to Arrange Mediation in Los Angeles County

Mediation for civil cases is voluntary and parties may select any mediator they wish. Options include:

a. **The Civil Mediation Vendor Resource List**

If all parties in an active civil case agree to mediation, they may contact these organizations to request a "Resource List Mediation" for mediation at reduced cost or no cost (for selected cases).

- **ADR Services, Inc.** Assistant Case Manager Janet Solis, janet@adrservices.com
(213) 683-1600
- **Mediation Center of Los Angeles** Program Manager info@mediationLA.org
(833) 476-9145

These organizations cannot accept every case and they may decline cases at their discretion. They may offer online mediation by video conference for cases they accept. Before contacting these organizations, review important information and FAQs at www.lacourt.org/ADR.Res.List

NOTE: The Civil Mediation Vendor Resource List program does not accept family law, probate, or small claims cases.

b. **Los Angeles County Dispute Resolution Programs.** Los Angeles County-funded agencies provide mediation services on the day of hearings in small claims, unlawful detainer (eviction), civil harassment, and limited civil (collections and non-collection) cases.

<https://dcba.lacounty.gov/countywidedrp/>

Online Dispute Resolution (ODR). Parties in small claims and unlawful detainer (eviction) cases should carefully review the Notice and other information they may receive about (ODR) requirements for their case. <https://my.lacourt.org/odr/>

c. Mediators and ADR and Bar organizations that provide mediation may be found on the internet.

3. **Arbitration:** Arbitration is less formal than trial, but like trial, the parties present evidence and arguments to the person who decides the outcome. In "binding" arbitration, the arbitrator's decision is final; there is no right to trial. In "nonbinding" arbitration, any party can request a trial after the arbitrator's decision. For more information about arbitration, visit <https://www.courts.ca.gov/programs-adr.htm>

4. **Mandatory Settlement Conferences (MSC):** MSCs are ordered by the Court and are often held close to the trial date or on the day of trial. The parties and their attorneys meet with a judge or settlement officer who does not make a decision but who instead assists the parties in evaluating the strengths and weaknesses of the case and in negotiating a settlement. For information about the Court's MSC programs for civil cases, visit <https://www.lacourt.org/division/civil/CI0047.aspx>

Los Angeles Superior Court ADR website: <https://www.lacourt.org/division/civil/CI0109.aspx>

For general information and videos about ADR, visit <http://www.courts.ca.gov/programs-adr.htm>